

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

WISCONSIN GAS LLC,

Plaintiff,

v.

AMERICAN NATURAL RESOURCES  
COMPANY AND HONEYWELL  
INTERNATIONAL, INC.

Defendants.

Case No. 2:20-cv-1334-SCD

**AMERICAN NATURAL RESOURCES COMPANY’S UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE REPLY BRIEF IN SUPPORT OF MOTION FOR  
SUMMARY JUDGEMENT OR, IN THE ALTERNATIVE, FOR JUDGMENT ON  
PARTIAL FINDINGS**

COMES NOW Defendant American Natural Resources Company and respectfully requests an extension of time up to and including February 27, 2023, to file its Reply Brief in Support of American Natural Resources Company’s Motion for Summary Judgment or, in the Alternative, for Judgment on Partial Findings. In support of this motion, Defendant states as follows:

1. On July 20, 2022, Defendant filed its Motion for Summary Judgment or, in the Alternative, for Judgment on Partial Findings.
2. On January 27, 2023, Plaintiff filed its Opposition to American Natural Resources Company’s Motion for Summary Judgment.
3. The Reply Brief in support of Motion for Summary Judgment is currently due February 10, 2023. Plaintiff has agreed to extend the deadline to file a Reply Brief until February 27, 2023.

4. This extension of time is sought due to the complex nature of the issues involved in the motion including the need to respond to over eighty counterstatements of fact.

5. This extension of time is also sought due to personal reasons related to the health of a family member of the undersigned counsel.

6. This extension of time will not prejudice any party, it is not sought for any improper purpose, and will not unduly delay the case.

WHEREFORE, Defendant request the Court enter an order granting this motion and extending the deadline to file a Reply Brief in Support of American Natural Resources Company's Motion for Summary Judgment or, in the Alternative, for Judgment on Partial Findings to February 27, 2023.

Dated: February 1, 2023

Respectfully submitted,

/s/ James F. Thompson  
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*ATTORNEYS FOR AMERICAN NATURAL  
RESOURCES COMPANY*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 1, 2023 I electronically transmitted the foregoing to the Clerk's Office using the CM/ECF System, which will send notice of the filing to counsel for all parties having appeared of record.

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